

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

IN RE:

BRUCE MASSEY, JR.

DOROTHY MASSEY

13-11328

CHAPTER 7

RESOURCEFUL ENVIRONMENTAL SERVICES, INC.

PLAINTIFF

VS.

BRUCE MASSEY, JR.

ADVERSARY PROCEEDING

DOROTHY MASSEY

DEFENDANT

NO. _____

COMPLAINT OBJECTING TO DISCHARGE OF DEBTORS

Comes now, Resourceful Environmental Services, Inc., by and through counsel, and files this Complaint Objecting to Discharge of Debtors pursuant to 11 U.S.C. Section 727 and Bankruptcy Rule 4004(2) and 7001(4), of the Federal Rules of Bankruptcy Procedure. In support of this Complaint, the Plaintiff would show as follows:

1. The Debtors in this case, Bruce Massey, Jr. and Dorothy Massey, recently amended their individual chapter 7 bankruptcy schedules to include invoices for Resourceful Environmental Services, Inc. The Debtors inaccurately listed the debt in the amount of \$2,000.00, when in actuality the bill is in the amount of \$9,372.02. At issue in this action, however, is not only the amount of the debt owed, but the fact that the debt is owed by the Limited Liability

Company owned and operated by the Masseys, "Bruce Massey Construction, LLC." See Exhibits "A", "B," and "C," incorporated herein as if fully copied in words and figures.

2. Bruce Massey Construction, LLC operating in the course of its normal business operations incurred the debts listed herein, and as such, the individuals are not entitled to a discharge of the debt.
3. Bruce Massey Construction, LLC remains liable for the debts at issue, and Plaintiff intends to continue to pursue all appropriate legal remedies to seek full payment of same.

PREMISES CONSIDERED, WHEREFORE Plaintiff prays:

- a. That the Defendants be required to answer in the time allowed by law;
- b. That upon a hearing in the matter, this Court deny the discharge of the debtors;
- c. That the Court grant such other relief as is just and proper.

RESPECTFULLY SUBMITTED,

/S/ Melissa A. Harrison

MELISSA A. HARRISON
Counsel for Plaintiff
P.O. Box 468
Ripley, MS 38663
Ripley, MS 38663
(662) 837-6180
(662) 837-7535 facsimile
mharrison@melissaharrisonlaw.com
MS Bar #100046

Statement

RESOURCEFUL ENVIRONMENTAL SERVICES, INC
PO BOX 598
RIPLEY, MS 38663
RETURN SERVICE REQUESTED
888-839-2830

Sun Sep 1, 2013

11837

Please Pay: \$9,372.02

LOCATION: Page 1

MASSEY CONSTRUCTION
PO BOX 1293
OXFORD, MS 38655-1293

MASSEY CONSTRUCTION

OXFORD, MS 38655

Terms: Due in 10 days

Resourceful Environmental Services, INC

Acct# 11837

Location: , OXFORD, MS

	Balance as of 7/1/13 :			\$7,583.50
7/9/13	30 YARD CONTAINER	R220 30	Tkt: 121172	\$265.00
7/9/13	Landfill Tax	R220 30	Tkt: 121172	\$10.50
7/9/13	Drop Fee	R640 20		\$75.00
7/9/13	Drop Fee	R441 20		\$75.00
7/15/13	30 YARD CONTAINER	R420 30	Tkt: 125743	\$265.00
7/15/13	Landfill Tax	R420 30	Tkt: 125743	\$10.50
7/16/13	Payment	#2382		\$-275.00
7/20/13	20 YARD CONTAINER	R640 20	Tkt: 125073	\$250.00
7/20/13	Landfill Tax	R640 20	Tkt: 125073	\$7.00
7/20/13	20 YARD CONTAINER	R441 20	Tkt: 125074	\$250.00
7/20/13	Landfill Tax	R441 20	Tkt: 125074	\$7.00
7/22/13	Drop Fee	R10 20		\$100.00
7/29/13	Invoice	53480	\$1,315.00	
8/1/13	40 YARD CONTAINER	R488 30	Tkt: 123472	\$325.00
8/1/13	Landfill Tax	R488 30	Tkt: 123472	\$14.00
8/1/13	30 YARD CONTAINER	R420 30	Tkt: 126619	\$265.00
8/1/13	Landfill Tax	R420 30	Tkt: 126619	\$10.50
8/2/13	20 YARD CONTAINER	R436 20	Tkt: 125761	\$250.00
8/2/13	Landfill Tax	R436 20	Tkt: 125761	\$7.00
8/10/13	30 YARD CONTAINER	R541 30	Tkt: 126659	\$265.00
8/10/13	Landfill Tax	R541 30	Tkt: 126659	\$10.50
8/13/13	20 YARD CONTAINER	R10 20	Tkt: 126666	\$250.00
8/13/13	Landfill Tax	R10 20	Tkt: 126666	\$7.00
8/15/13	Invoice	53933	\$1,404.00	
8/16/13	Toilet Rental	8/14- 8/31 042		\$41.14
8/17/13	Drop Fee	R403 30		\$75.00
8/19/13	Payment	#1121		\$-275.00
8/19/13	Payment	#1139		\$-775.00
8/19/13	30 YARD CONTAINER	R541 30	Tkt: 127039	\$265.00
8/19/13	Landfill Tax	R541 30	Tkt: 127039	\$10.50
	Sales Tax:			\$2.88
	Balance Due:			\$9,372.02



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LOCATION: Page 2

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MASSEY CONSTRUCTION

OXFORD, MS 38655

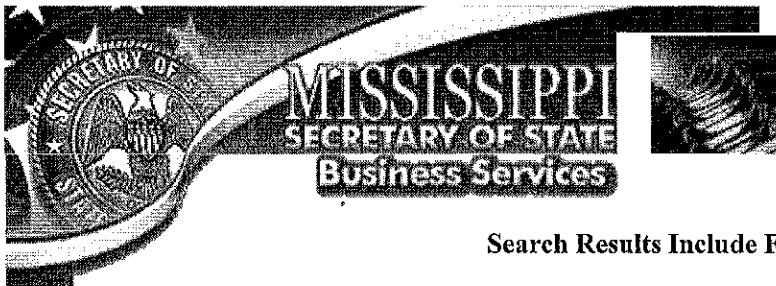
Terms: Due in 10 days

Resourceful Environmental Services, INC

Acct# 11837

Location: , OXFORD, MS

Grand Total: \$9,372.02



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Business

Home

Date: 10/18/2013 [View Filed Documents](#)
Name History

Name	Name Type
Bruce Massey Construction, LLC	Legal

Limited Liability Company - Domestic - Information

Business ID:	891455
Status:	Good Standing
Creation Date:	5/3/2006
State of Incorporation:	MS
Principal Office Address:	2084 OLD TAYLOR ROAD, SUITE 110 OXFORD MS 38655
Listing Address:	No Address

Registered Agent

Agent Name:	Massey, Bruce
Office Address:	2084 Old Taylor Road, Ste 110 PO Box 1293 Oxford MS 38655

Mailing Address:

Officers & Directors

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OFFICE OF THE MISSISSIPPI

P.O. BOX 136, JACKSON, MS 39205-0136 (601) 359-1333

Certificate of Formation



The undersigned, pursuant to Senate Bill No. 2395, Chapter 402, Laws of 1994, hereby executes the following document and sets forth:

1. Name of the Limited Liability Company

Bruce Massey Construction, LLC

2. The future effective date is
(Complete if applicable)

5/1/06

3. Federal Tax ID

4. Name and Street Address of the Registered Agent and Registered Office is

Name

Bruce Massey

Physical
Address

719 S. 8th St. Apt #4

P.O. Box

PO 1293

City, State, ZIP5, ZIP4

Oxford

Ms

38655

5. If the Limited Liability Company is to have a specific date of dissolution, the latest date upon which the Limited Liability Company is to dissolve

6. Is full or partial management of the Limited Liability Company vested in a manager or managers? (Mark appropriate box)

☐

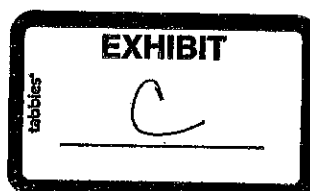
Yes

☒

No

7. Other matters the managers or members elect to include

* Only Bruce Massey



102037515

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OFFICE OF THE MISSISSIPPI SECRETARY OF STATE
P.O. BOX 136, JACKSON, MS 39205-0136 (601) 359-1333
Certificate of Formation



By: Signature

Bruce Massey

(Please keep writing within blocks)

Printed Name

Bruce Massey

Title

Owner

Street and Mailing Address

Physical Address

719 S. 8th St. #4

P.O. Box

1293

City, State, ZIP5, ZIP4

Oxford

Ms

38655

By: Signature

Bruce Massey

(Please keep writing within blocks)

Printed Name

Bruce Massey

Title

Owner

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